



NCFC

National Council of Farmer Cooperatives

CO-OP/PAC®

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FEC MAIL CENTER

Tel: 202-626-8700

Fax: 202-626-8722

50 F Street, NW Suite 900

Washington, DC 20001

www.ncfc.org

August 27, 2014

Chris Morse
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Dear Mr. Morse,

I am writing in response to a letter received by the NCFC CO-OP/PAC concerning the Commission's preliminary review of the PAC's August Monthly Report (07/01/2014-07/31/2014) and the inadvertent election misdesignation of a contribution to Valadao for Congress Committee made on July 14, 2014 in the amount of \$3,000.

In response to the Commission's letter, the NCFC CO-OP/PAC filed a Miscellaneous FEC Form 99 on August 26, 2014. The form states that the Valadao for Congress Committee designated the original contribution to the General 2014 election since the Primary 2014 election had passed. NCFC CO-OP/PAC will show its redesignation of this contribution on the September Monthly FEC report.

Please find the following documents enclosed to support NCFC CO-OP/PAC's corrective actions:

1. A copy of the original FEC letter requesting corrective action;
2. A copy of the correspondence between the Treasurer of NCFC CO-OP/PAC and representatives of Valadao for Congress Committee;
3. A copy of Miscellaneous FEC Form 99 filed on August 26, 2014 explaining the redesignation of the contribution by the Valadao for Congress Committee; and
4. A copy of the FEC Financial Disclosure Filing Acknowledgement of Miscellaneous FEC Form 99.

Please contact me if you have any questions or if the Commission needs additional information about these corrective actions.

Sincerely,

Kelsey A. Swango

Treasurer, NCFC CO-OP/PAC

National Council of Farmer Cooperatives

Representing the Business Interests of Agriculture

A committee of farmer cooperative leaders, NCFC CO-OP/PAC is registered under the Federal Election Campaign Act of 1971. A copy of periodic reports is filed with and available from the Federal Election Commission, Washington, DC 20463. Contributions to CO-OP/PAC are not deductible for Federal income tax purposes.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 25, 2014

KELSEY A. SWANGO, TREASURER
NATIONAL COUNCIL OF FARMER
COOPERATIVES CO-OP/PAC
50 F STREET NW SUITE 900
WASHINGTON, DC 20001

Response Due Date
09/29/2014

IDENTIFICATION NUMBER: C00002238

REFERENCE: AUGUST MONTHLY REPORT (07/01/2014 - 07/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2014 primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b) (1) and (3))

NATIONAL COUNCIL OF FARMER COOPERATIVES CO-OP/PAC

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Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,



Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Prohibited, and Impermissible Contributions
National Council of Farmer Cooperatives CO-OP/PAC (C00002238)

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election (State-Date)
Valadao For Congress	7/14/14	\$3,000.00	P2014	CA - 6/3/14

Swango, Kelsey

From: Melissa Allen <mallen@directfile.com>
Sent: Tuesday, August 26, 2014 12:53 PM
To: 'Sara Bonjean'; Swango, Kelsey
Subject: RE: Valadao Redesignation Request

Hi Kelsey, and Sara,

Actually this contribution went in for the General from the get go. Since we were out of Primary range, it had to go in for the general. So no worries, it is taken care of ☺.

Let me know if you need anything else.

Thanks!

Melissa

From: Sara Bonjean [<mailto:sbonjean@rosestrategies.com>]
Sent: Tuesday, August 26, 2014 9:38 AM
To: Swango, Kelsey
Cc: Melissa Allen
Subject: Re: Valadao Redesignation Request

Hi Kelsey,
No problem. Melissa, can you please help us redesignate the aforementioned contribution to Valadao for Congress?
Thanks!
Sara

Sent from my iPhone

On Aug 26, 2014, at 9:27 AM, "Swango, Kelsey" <kswango@ncfc.org> wrote:

Hi Sara,

It appears that I incorrectly designated a contribution to Valadao for Congress on July 14, 2014 to his Primary 2014 instead of his General 2014. Could you please re-designate the \$3,000 contribution to the General 2014?

Could you please confirm when this has been completed so I can notify the FEC?

If there is someone else with the committee that I should speak with regarding this matter, could you please put me in touch with them?

Thank you and sorry for the inconvenience.

Kelsey Swango
Director, Government Affairs
& Treasurer, NCFC CO-OP/PAC
National Council of Farmer Cooperatives
50 F Street NW, Suite 900

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In response to the FEC's request for additional information letter sent on August 25, 2014 regarding NCFC CO-OP/PAC's (C00002238) August Monthly Report (07/01/2014-07/31/2014), the Valadao for Congress Committee designated the original contribution to the General 2014 election since the Primary 2014 election had passed. NCFC CO-OP/PAC will show its redesignation of this contribution on the September Monthly FEC report.

INFORMATION

Swango, Kelsey

From: FEC Filing Server <noreply-efiling@fec.gov>
Sent: Tuesday, August 26, 2014 1:31 PM
To: Swango, Kelsey
Subject: FEC Electronic Filing Results

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 08/26/2014 - 13:30:39, and was assigned the Filing ID of: FEC-948704

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 8.1

For technical support, please contact: ELECTRONIC FILING OFFICE, FEC Direct dial: 202-694-1642, Toll free: 1-800-424-9530 x 1642

=== Identification Section =====

Committee ID: C00002238

Committee Name: NATIONAL COUNCIL OF FARMER COOPERATIVES CO-OP/PAC

Filing Type: F99

Software/Ver#: Campaign Manager 360 / Ver# 1.0

=== Results Section =====

>>>----> FEC data file PASSED validation! <----<<<

MD5 checksum:

f028f0a60a75e35e254c8dcb1b1bac4e



NCFC

National Council of Farmer Cooperatives
CO-OP/PAC®

50 F Street, NW, Suite 900, Washington, DC 20001

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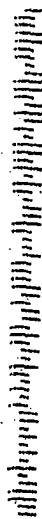
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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 8/27/14
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (8/2013)	9/2/14 DATE PREPARED

2014-09-02 14:00:00